LUMER & NEVILLE

Attorneys At Law

MICHAEL B. LUMER
JAMES C. NEVILLE

225 BROADWAY SUITE 2700
NEW YORK, NEW YORK 10007
WWW.LUMERNEVILLE.COM

(212) 566-5060
FACSIMILE (212) 406-6890

June 28, 2016

By ECF

Hon. Roanne L. Mann
United States Chief Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Wilson v. City of New York, et al.,
15 CV 5818 (WFK) (RLM)

Dear Judge Mann:

I have just been retained as co-counsel for plaintiff in the above referenced action and write to respectfully request that the Court enlarge the present fact and expert discovery deadline from July 8 to August 19, 2016. The defendants consent to this request, which is the first application by any party to extend discovery in this matter.

It is my understanding that a substantial amount of paper discovery has been exchanged, including the transcript of plaintiff's underlying parole violation hearing, medical records from Interfaith Hospital and the Department of Corrections, and criminal court documents. However, depositions have not yet been held and there are a few outstanding discovery issues o be ironed out by the parties. The brief enlargement of time should be sufficient for the parties to resolve the various matters that require our attention, while taking into account the parties' various schedules and, in plaintiff's case, his physical location.

Thank you for your consideration.

Respectfully submitted,

Michael Lumer

cc: All counsel of record (By ECF)